ROUTING AND RECORD SHEET												
SUBJECT: (Optional) FOIA Exemptions (b)(3) and (b)(1), OSS Records, and												
E.O. 12065 Req	uests	EXTENSION NO.										
Deputy Director of Inf Services	formatio	n,		OIS 81-179/2								
1206 Ames Building	r 			2 7 MAR 1981								
TO: (Officer designation, room number, and building)	DATE		OFFICER'S	COMMENTS (Number each comment to show from whom								
W.	RECEIVED	FÖRWARDED	114111253	to whom. Draw a line across column after each comment.)								
1. Chief, IPD				Regarding the minutes of the								
2. STAT				4 March 1981 meeting concerning FOIA exemptions (b) (3) and (b) (1), OSS records, and E.O. 12065								
3. STAT		· 基本公司		requests, paragraph ld assigned IPD action regarding the use of								
STAT	70 PK V	un interes	Was de ang	(b)(3) without claiming (b)(1).								
AND THE RESERVE STATES				I would appreciate it if								
5. STAT				you would be sure to send and myself a copy of your note to all FOIA personnel establishing the								
6. STAT				policy to be followed when only (b)(3) is claimed.								
STAT												
8.		is it										
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12. DDIS (27 Mar	981)											
13. Distribution: Orig. PRS Addressee												
1 - OIS Subj (C	LAS REV	LEW)										
15.												

FORM 610 USE PREVIOUS

MINUTES

FOIA Exemptions (b)(3) and (b)(1), OSS Records, and E.O. 12065 Requests

4 March 1981

1. Discussion of implications of use of FOIA (b) (3) (sources and methods) exemption, without use of (b) (1) (classification) exemption, and its impact upon NARS' ability to protect CIA's information in NARS' custody. Included is discussion of NARS' claim of inconsistency between applications under FOIA and E.O. 12065.

After extensive discussion on the use of the (b)(3) (sources and methods) exemption without the use of the (b)(1) (classification) exemption, several actions were proposed as follows:

- a. A technical amendment should be proposed to E.O. 12065 which would delegate from the DCI to a lower senior level the authority to classify a document after the fact when one is located under the FOIA process which merits classification. Records Management Division, OIS has the action on this particular item.
- b. Amend E.O. 12065 to include a statement that identifies sources and methods, organizational titles, names of employees, etc., as constituting identifiable damage if released. Action on this item has been assigned to RMD/OIS.
- c. A letter be prepared to the Administrator of General Services (or the Archivist of the U.S., as appropriate) signed by the DCI which establishes an inter-agency agreement making intelligence information which concerns sources and methods as an area which automatically requires continued protection to the National Archives even though it is not marked as classified information. RMD/OIS is to prepare a draft of this letter and coordinate it with all appropriate Agency components and with appropriate personnel at NARS. Upon completion of all coordination, this letter will be sent from OIS to the Director for signature with a copy to Director, ISOO.

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indulud in 60 12356.

> Done-Del letter dated Thirsh

0 1 APR 1981

MEMORANDUM FOR: IPD Case Officers

FROM:

Chief, Information and Privacy Division

SUBJECT:

Use of FOIA (b)(3) (Sources & Methods) Exemption

- 1. Agency components have at times asserted the (b)(3) FOIA exemption without claiming (b)(1) for documents less than 20 years of age. While the courts have upheld this position as valid, the National Archives has difficulty in assuring that CIA information in its custody is not inadvertently released.
- 2. At a meeting chaired by the Director of Information Services and attended by representatives of OGC, DO/IMS, DO/OIS/RMD, OIS/IPD, and OIS CRD, it was gnerally agreed that whenever a (b)(3) exemption is used, a (b)(1) should be present. That is, when a document contains (b)(3) information, it should under most circumstances be classified.
- 3. In the future, the initial reviewers will attempt to use the (b)(1) exemption whenever they cite the (b)(3). In preparing finals, IPD Case Officers should, in those instances when the (b)(3) without the (b)(1) is cited, attempt to determine a reason to cite the (b)(1). Having made this determination, the IPD Case Officer should contact the appropriate reviewing official and recommend adding the (b)(1) exemption to the component response.
- 4. In instances where the IPD Case Officer and the reviewing official cannot agree on a (b)(1) exemption, the request will
 be forwarded to the Director of Information Services for final
 determination.

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- 1 IPD Case Officers
- 1 OIS (FYI)
- 1 Directorate FOI Officers
- 1 IPD Procedures
- 2- Corres

R	OUTING	G AND	RECOR	D SHEET								
SUBJECT: (Optional)												
Use of FOIA (b)(3) (Sources	s and Me	ethods)	Exemption	on								
FROM:				EXTENSION NO. 0/5 8/-/79/5								
Chief, Information & Privacy Division				DATE								
	,	·	31 March 1981									
TO: (Officer designation, room number, and building)	DA	ATE	OFFICER'S	COMMENTS (Number each comment to show from whom								
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DIS ?	APR 1981 3 APR											
2.	- A - C - C - C - C - C - C - C - C - C			The attached instruction is in accordance with the discussions of the (b)(1), (b)(3) exemptions at the 4 March 1981 meeting. In								
DDIS	Ļο	,		order to keep it internal and since the IPD Case Officers will be the ones to monitor this pro-								
4.				cedure, I have issued it as an internal IPD instruction, with copies to FOI Officer. We are								
5.		, -		still working on a procedure for documents that are 20 years or older.								
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- d. IPD is to review all FOIA cases where (b)(3) is claimed without claiming (b)(1). In these instances, IPD is to make contact with the originating office to determine whether (b)(1) can also be claimed. If neither a component nor IPD can justify using the (b)(1) exemption, it is to be referred to the Director of Information Services, DDA (DIS/DDA) for a determination. These efforts should avoid the confusion that now arises at NARS when only (b)(3) is claimed. IPD should circulate a note to all FOIA personnel establishing the policy that is to be followed when only (b)(3) is claimed.
- 2. Discussion on deletion of CAS from Agency documents under FOIA or Systematic Declassification Review Provisions of E.O. 12065.

Consensus is that the term "CAS" has been compromised. Thus, the issue is no longer the word "CAS", but rather how it is used in the context of the document concerned. If the additional information surrounding the word "CAS" is sensitive, then that is the information that needs to be protected, not so much the word "CAS".

3. Discussion of restrictions placed on Agency OSS records in NARS' custody.

It was agreed that NARS is in the process of deciding whether the records should be returned to the Agency. Because the DO is prepared to service requests for the OSS records rather than lift any restrictions now placed on OSS records, it was agreed to wait for NARS to make its determination and then for the Agency to accept custody of the OSS records.

4. Discussion of E.O. 12065 mandatory review requests being handled in same queue as FOIA and PA requests on a first-in, first-out basis.

After having heard further expansion of the manner in which the DO maintains its E.O. 12065 queue thus being ensured that there was really a separate queue for E.O. 12065 requests, the Office of General Counsel representative felt that we could defend their handling of the E.O. 12065 requests and still not be in violation of IPD's practice that advises that requests are processed on a first-in, first-out basis.

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Thomas H. White
Director of Information Services, DDA

SUBJECT: FOIA Exemptions (b)(3) and (b)(1), OSS Records, and E.O. 12065 Requests

Distribution:
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C/IPD/OIS
C/CRD/OIS
OGC (L. Strickland)
RSB/RMD/OIS
RSB/RMD/OIS
RSB/RMD/OIS

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AGENDA

OIS Registry
File: Clas Review

FOIA Exemptions (b)(3) and (b)(1), OSS Records, and E.O. 12065 Requests

4 March 1981 1:00-3:00 p.m. 1D35 HQS

1. Discussion of implications of use of FOIA (b)(3) (sources and methods) exemption, without use of (b)(1) (classification) exemption, and its impact upon NARS' ability to protect CIA's information in NARS' custody. Included is discussion of NARS' claim of inconsistency between applications under FOIA and E.O. 12065.

Background

Under FOIA, the Agency frequently asserts the (b)(3) exemption without claiming (b)(1). Court cases have upheld this position as valid. NARS feels that when similar material is reviewed by us under the Systematic Declassification Review Provisions of E.O. 12065 we claim that the material is classified. This inconsistency puzzles NARS and worries them that they are not presently able to adequately protect "sources and methods" information unless it is classified. One suggestion from Director, ISOO is for the DCI to advise the U.S. Archivist that an additional restriction should be added to the present general restrictions to cover intelligence sources and methods material.

2. Discussion on deletion of CAS from Agency documents under FOIA or Systematic Declassification Review Provisions of E.O. 12065.

Background

NARS has expressed doubts that we are proper in withholding the release of "CAS" when in fact they claim it has been officially disclosed.

Discussion of restrictions placed on Agency OSS records in NARS' custody.

Background

When OSS records were accessioned to NARS, the Agency placed a requirement on NARS that before information could be released from OSS records the privacy of each individual mentioned would need to be protected. This restriction could be overcome if the individuals

we devoted not to pursue se Del sette duted 27 ppr 661 mentioned would consent to the release of information containing their names. NARS cites an example whereby records in RG 226 have been available for years to researchers without the same restrictions imposed on the OSS records recently accessioned to NARS. The current restrictions are untenable to NARS. Under the FOIA, the Agency normally releases, with few exceptions, names of former OSS employees.

4. Discussion of E.O. 12065 mandatory review requests being handled in same queue as FOIA and PA requests on a first-in, first-out basis.

Background

There appears to be inconsistency between components as to whether a special queue is set up for E.O. 12065 mandatory review requests or whether they are included in same queue as FOIA and PA requests. Are we jeopardizing our court posture on the Open America case with this inconsistency? Also, IPD presently acknowledges to Presidential Libraries, NARS, and individual E.O. 12065 requests that we handle all requests on a first-in, first-out basis.

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SUBJECT: FOIA Exemptions (b)(3) and (b)(1), OSS Records, and

E.O. 12065 Requests

Distribution:
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C/IPD/OIS
C/CRD/OIS
OGC (L. Strickland)
RSB/RMD/OIS

RSB/RMD/OIS RSB/RMD/OIS

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(23 Feb 1981)

Distribution:

Original - OIS Subject (E.O. 12065)

1 — Each addressee



OIS Registry
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Ols Registry File: Clas Review

MEMORANDUM FOR THE RECORD

SUBJECT: Meeting With Officials From ISOO and NARS, 5 February 1981

1. In attendance were Steve Garfinkel, Harry Mason, and Laura Kimberly from ISOO; Milton Gustafson, Edwin A. Thompson, and Jo Anne Williamson from NARS; and, representing the Agency, from RMD, from CRD from IPD.

- This meeting was a followup to an earlier meeting with Harry Mason of ISOO. NARS officials, particularly Mr. Thompson, Chief of the Records Declassification Division, were concerned over the fact that, in responding to FOIA requests, the Agency sometimes invoked FOIA exemption (b)(3) only for information when a case could be made for asserting (b)(1) as well. They were afraid that that could not assure us that the information would not be inadvertently released in the future. Classified material is stored in a separate vault at NARS. Unclassified material is kept in the archives boxes, and the archivists are charged with screening the boxes before they are made available to researchers to ensure that documents covered by NARS restrictions or FOIA exemptions are not included. NARS takes the position that all of the FOIA exemptions other than (b)(1) are discretionary and that their personnel are authorized to make these judgments. Subsequently, Mr. Gustafson, who is Chief of the Diplomatic Branch at NARS, approached ISOO, asking whether the CIA was justified in deleting the initials "CAS" or the phrase "controlled American source" from documents in view of the fact that it has been officially disclosed that CAS means, in effect, CIA.
- 3. In the earlier meeting, Mr. Mason seemed to be persuaded that, depending upon the context, CAS often has to be excised from documents. The DDO spokespersons explained their reluctance to claim that the release of information over 30 years old warranted continued classification, i.e., that its unauthorized disclosure would result in "at least identifiable damage to the national security," even though it concerns intelligence sources and methods. Mr. Mason was also assured that the courts had consistently ruled that the CIA statutes, 50 U.S.C. 403(d)(3) and 50 403 U.S.C. 403g, were valid (b)(3) statutes. In addition, he was advised that we did not consider the application of these statutes to be discretionary and that it was incumbent upon NARS

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to develop and implement procedures to ensure that none of our (b)(3) information is ever disclosed to researchers without CIA's prior approval. (Much of this had been discussed previously with Mr. Thompson in telephone conversations with

- The 5 February meeting, which was held at CIA Headquarters Building, was convened at the request of It started out with Mr. Thompson summarizing the Mr. Thompson. He seemed somewhat perplexed by the fact that CIA representatives had reviewed these documents under the systematic review program and had certified their need for continued classification. Yet, when the documents were referred to the Agency in connection with FOIA requests, the CIA did not claim the (b)(1) He asked once again if it would not be simpler for exemption. the Agency to cite (b)(1) as well as (b)(3), and suggested that ISOO could promulgate a definition of "identifiable damage" broad enough to cover the information in question. The DDO spokespersons pointed out that the reviewing officials, knowing that they might have to sign affidavits at a later date, would refuse to do It was pointed out that it seemed ironic for NARS and ISOO to criticize the Agency for declassifying information when they are constantly admonishing federal agencies against needless classification.
- 5. Mr. Gustafson again questioned the need to withhold this information under (b)(3), noting that researchers can very easily insert the initials CIA in the blanks. The importance of avoiding official acknowledgement of the location of CIA stations in particular locations was explained to him, along with the possible consequences of such an acknowledgement. When Mr. Gustafson questioned whether the Agency's two statutes qualified as valid (b)(3) laws, he was assured that the courts had consistently accepted them as such. This was verified by Messrs. Thompson and Garfinkel.
- 6. Once that there was general acceptance of the fact that the (b)(3) information identified by the Agency would have to be protected from inadvertent disclosure, the discussion got around to ways and means. The NARS people seemed to think that the best thing would be to place the sanitized version of the document in the archives box, attached to a withdrawal sheet explaining the location of the full-text version. Instead of storing the full-text copy in an envelope at the back of the archives box—the usual practice—Mr. Gustafson believed that it would be preferable to set up a special file. As an added precaution, it was suggested that the Agency might ask the Archivist to add a new general restriction to cover the sort of information the Agency wants protected. What is needed is a letter from the DCI to the

Archivist of the United States, requesting that a restriction be placed on all documents containing information relating to intelligence sources and methods. The letter would have to explain in some detail just what constitutes an intelligence source or a method, and should also note that such things as the names, titles, etc., of Agency personnel and organizational units are The letter would have to specify the period of time included. that the information has to be protected. For example, we could have the restriction good for 75 years after the date that the Or we could have the restriction document was originated. effective for a lesser period of time, such as 40 years, after which time it would be subject to a second review by the Mr. Thompson and Mr. Garfinkel offered to review our letter in draft to make certain that it met their needs. Later, in a telephone conversation with Mr. Thompson offered to consult with the drafter at any time. The CIA people present at the meeting seemed to agree that it would be appropriate that OGC prepare the letter for the DCI's signature.

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Moving on to another topic, Mr. Thompson questioned on the matter of the restrictions the Agency has placed on access to the OSS records accessioned by NARS last When indicated that the CIA might not be willing to liberalize them, Mr. Thompson pointed out that the OSS records in RG 226 had been open to researchers for years, without any requirement that NARS obtain the consent of individuals whose names appear in the documents. He stated, further, that he regarded the restrictions as totally unreasonable and that NARS never should have accepted the records under those terms. Mr. Thompson said that, unless an accommodation was reached, NARS would have to return the records to CIA's custody. observed that a William Cassidy of California had notified IPD of his intention to request the records under the FOIA unless NARS made them available to researchers.

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8. Actions required of the Agency:

a. Some office (OGC would seem to be the logical component) must be tasked with drafting a letter from the DCI to the Archivist of the United States asking that NARS add to its general restrictions provisions for the protection of intelligence sources and methods, etc., as discussed in paragraph 6, above. If further guidance is needed, Mr. Thompson of NARS can be reached on 523-3165.

b. We need to resolve the problem of the restrictions placed upon the OSS records which NARS finds unacceptable.

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Otherwise, NARS is apt to return the records to the CIA and we will be faced with processing them under the FOIA--in which case, only that information which, if disclosed, would clearly constitute an unwarranted invasion of the privacy of others can be withheld. (Under guidelines approved by former DCI William Colby, with few exceptions, names appearing in OSS documents have been released in fulfilling FOIA requests.)

c. We obviously need to sharpen our what information requires classification be must appear to NARS that the Agency's left what its right hand is doing. CRD, in its determinations, asserts that documents controlled American source retain their classification soldering the same documents sometimes says "not so!" To further complition, when such documents are considered in mandatory review requests from the Presider in order to protect the information, classification must be continued. (Under couch documents are not public records and atrolled exclusively by classification and drestrictions.)	eyond 20 years. It hand does not know systematic review taining CAS or assification. Yet under the FOIA, 25X1 icate the situation with a connection with a tial libraries, will maintain that GSA regulations, 25X1 access is con-
restrictions.)	2581

IPD/CES/lr 9 Feb 81
Distribution:
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- DIS
1 - CRD
1 - OGC
1 - RMD
1 - DDO/IMS/
1 - IPD Chrono
1 - Corres

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6 February 1981

Chief, Classification Review Division MEMORANDUM FOR: FROM: 25X1 Chief, Operations Branch SUBJECT: Meeting with NARS and ISOO Representatives Concerning the Problem of withholding Unclassified Documents for CIA 25X1 1. The meeting was held on 5 February 1981 at the IMS/DO conference room at Headquarters. Attending were: (C) Alan Thompson, Chief, Declassification Division, NARS 25X1 Milton Gustafson, Chief, Diplomatic Archives Branch, NARS Joanne Williamson, Chief, Civilian Archives Review Branch, NARS Steve Garfinkel, Director, ISOO Harry Mason, ISOO Deputy Chief, IPD/OIS RMD/OIS RMD/OIS 25X1 CRD/OIS Chief. IMS/DO 'IMS/DO

2. The meeting was called by Alan Thompson of NARS to discuss a problem NARS is having protecting some Agency information contained in unclassified documents. Though no classification markings are used NARS must still handle this material as classified which they find very burdensome, and NARS people fear that they might inadvertently release some of this unmarked material with the passage of time, changes in personnel, and other such slippage-causing developments. This is information CIA wants to protect under the (b)(3) exemption of the FOIA Act, namely "specifically exempted from disclosure by statute." This refers primarily to the 1947 and 1949 statutes authorizing the Director to protect sources and methods and the implication deriving from this authority that protection may be granted with or without a classification being applied to the information. Exemption (b)(1) refers to information authorized under criteria established by an Executive Order to be kept secret. This poses no problem because we are willing to classify documents that are not classified when they contain information which falls within this category

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of exemption. Also, there is no problem when (b)(1) is cited together with (b) (3) as is often the case. The problem arises when we cite (b) (3) only and the document contains no classification markings. there are cases where we want to protect information but feel that it does not meet the classification criteria established by E.O. 12065. To classify such a document would weaken the Agency's position to protect the information if a judge found the information improperly classified. The suggestion was made to have NARS stamp such documents as being protected under the (b)(3) exemption but NARS does not want to mark documents in any way except to indicate that they are declassified. The potential solution was suggested by Steve Garfinkel. He suggested that the Director write a letter to the Archivist of the United States requesting that a general restriction be placed on such documents held This in affect would provide guidance for NARS management to apply to their classification review process and thus alert classification reviewers and keep reminding them that they must recognize such material and protect it. What happens in practice is that classified material is removed from a box of records and kept in a special location. Withdrawal notices are used to indicate which documents have been removed. Some of the removed documents will not carry classification markings and this was the core of the problem as presented by NARS. The letter will be prepared and coordinated by RMD/OIS and DO and may be run by NARS in draft if desired.

3. Following the above discussion, Alan Thompson brought up the matter of DO insistence on withholding the names of OSS personnel from release in OSS records accessioned to NARS. Stated that CIA at the present time is standing by the exemption as accepted when NARS signed the Accessioning Agreement. Alan Thompson said that practically every document would thus have to be cleared through CIA and therefore CIA might as well hold the records. said, speaking for the CIA, that the Agency was willing to take the records back. Alan Thompson then went on at considerable length and with some consternation that he could not see why it was necessary to withhold such names given the passage of almost 40 years since WWII and the desire of NARS on behalf of the U.S. Government to make records available to the public. No suggestions or recommendations came out of this discussion.

4. Finally, after the end of the formal discussion, Joanne Williamson raised a point with the undersigned about some of the records we have asked be withheld from State records in RG-59 for the period 1945-49. The problem arises where we have asked that certain files be withheld in their entirety because such a high percentage of the material remains classified and requires continued protection. Some of the documents in these files are not marked with a classification but, for example, the information is sensitive because the file number stamped on them signifies CIA or CIG and when considered together with the text of the document identifies personnel and cover slots among other things. There are not many such documents but Ms. Williamson could not estimate just how many there are. Her people must list these documents on a computer listing and these will be entered with no classification. The computer listing will eventually be sent to CIA for certification by the Director either that they are

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classified or that they require of the CIA make this certification? matter and advise Ms. Williamson.	Th	tir ne	nue un	d p der	rot sig	ect ned	sa	id l	Her he	que wou	est 1d	ion v look	vas, into	will the	25 X 1
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Distribution:

(Orig - Liaison w/NARS)

1 - Liaison w/ISOO

1 - OPS Branch

1 - Chrono



2 February 1981

MEMORANDUM FOR: Ben Evans

Executive Secretary

FROM

Roberta Knapp

Acting, Chief, History Staff

SUBJECT

Materials Relating to OSS

- 1. The mandate of the CIA History Staff covers the period from 1947--the establishment of the Agency--to the present. OSS and other World War II activities are covered incidentally in some of the History Staff's classified, closely held publications that deal with units having continuity from the war period. Examples include the Foreign Broadcast Information Service, map information, printing, and security elements, and certain West European stations. A two-volume classified study titled "Donovan and the CIA" was published without the imprimatur of the History Staff by the Intelligence Institute of the Office of Training. The History Staff has no work in progress on the OSS.
- The Agency holds 6,500 cubic feet of OSS records, of which approximately half were determined by the Archivist of the National Archives and Records Center in 1978 to be of permanent value. A classification review team of about 15 former intelligence officers--some with service going back to OSS--has been at work since January 1979 to review the classification ofthese permanent records for eventual accessioning to NARS. As of the end of 1980, this team had reviewed 1,600 cubic feet of the permanent OSS records, declassifying about 93 percent. The main reasons for withholding the 7 percent were to protect sources, foreign government information, and foreign liaison relationships. There remain approximately 1,500-1,700 cubic feet to be reviewed, with the exact amount to be determined by decisions from NARS as to whether certain OSS records are in fact of permanent value. The target date for completion of the classification review is summer 1982.
- 3. Following classification review, the Information Management Staff of the DO--the custodian of the OSS files--arranges, in coordination with the Records Management Division of the Office of Information Services, DA, for accessioning to NARS. The first 198 cubic feet of OSS records was transferred to NARS in January 1980. Provisions in the accessioning agreement relating to restrictions on the release of the names of US persons affiliated with the OSS are still under discussion. CIA has stated its willingness to negotiate suitable alternatives to the specific restrictions cited in the agreement. After accessioning, NARS must process the material for presentation and release to the public

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Page 2 Memo for Ben Evans 2 February 1981

- 4. In 1945 the Research and Analysis component of OSS, together with its records, was merged into the Department of State. The Research and Analysis records--mostly reports--were turned over to NARS and reviewed for declassification by the CIA review team beginning in 1972. Over 90 percent of these materials have been declassified. They are available on microfilm from University Publications.
- 5. The CIA Library's Historical Intelligence Collection includes both the classified and the sanitized versions of the War Report--Office of Strategic Services prepared in 1947 and published in 1949 by the History Project of the War Department. It also has various OSS training manuals and occasional publications, as well as a large collection of unclassified memoirs and other materials relating to the history of the OSS.

Roberta Knapp Acting Chief, CIA History Staff 203 Key Bldg.

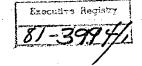
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General Services

Administration Washington, DC 20405

5/0331/2

MAY 13 1981



Honorable William J. Casey Director Central Intelligence Agency Washington, DC 20505

Dear Mr. Casey:

This is in response to your letter of April 27 regarding intelligence records in the legal custody of the National Archives and Records Service. I fully share your determination to protect from unwarranted disclosure sensitive U.S. Government information concerning intelligence sources and methods.

Officials at the National Archives are anxious to discuss your concerns and explain current National Archives procedures for protecting information about intelligence sources and methods as well as information about the organization, functions, names, official titles, salaries, or numbers of personnel employed by the Central Intelligence Agency. I have asked Dr. Edward Weldon, Deputy Archivist of the United States, to assume responsibility for clarifying and resolving the concerns addressed in your letter. Please ask your representative to contact him directly at the National Archives and Records Service, Washington, DC 20408, 523-3132, to arrange a meeting between your staff and his.

I have asked Dr. Weldon to keep me fully informed about this matter. If I can help further, please let me know.

Sincerely:

November Administrator